

REMARKS

Claims 1-10 are all the claims pending in the application.

The Examiner rejects:

- Claim 8 under 35 U.S.C. §112, second paragraph, due to a lack of antecedent basis for one of the limitations recited therein, and under 35 U.S.C. § 102(e) as being anticipated by Pope; and
- Claims 1-7, 9 and 10 under 35 U.S.C. § 103(a) as being unpatentable over Pope in view of Goldstein.

Also, the Examiner objects to the title and the abstract due to the informalities noted on page 2 of the Office Action.

Formal matters:

Applicant thanks the Examiner for acknowledging Applicant's claim to foreign priority and the receipt of the priority document. However, the Examiner did not return an initialed Form PTO 1449 listing the references submitted with Applicant's IDS filed July 14, 2000. Applicant requests the Examiner to return the initialed Form PTO 1449 accordingly, with the next Office correspondence.


In view of the Examiner's comments, Applicant amends the title and the abstract (see enclosed Appendix), and respectfully requests the Examiner to approve the new title and abstract as set forth above.

Applicant amends claims 1-10 to correct minor grammatical errors and to conform these claims to more conventional format in accordance with U.S. Patent practice. Applicant notes that

the amendments to claim 8 also remedy the lack of antecedent basis noted by the Examiner. These amendments do not narrow the scope of the original claims, but are simply clarifying amendments for correcting minor grammatical and formatting errors. In addition, Applicant amends independent claims 1, 7, 9 and 10 to more fully recite the feature of the “controller” as defined in the original claims. The amendments to claims 1, 7, 9 and 10 do not narrow the scope of equivalencies encompassed by the original claims 1, 7, 9 and 10, but merely make explicit what was believed to have been implicitly defined in the original claims 1, 7, 9 and 10.

Prior Art Rejections:

With regard to the §102 rejection of claim 8, Applicant amends claim 8 to depend on claim 7. While this amendment is intended to be merely a clarifying amendment (claim 8 recites the features in accordance with a particular embodiment of the “trigger signal” which is introduced in claim 7), it also renders moot the Examiner’s rejection of claim 8 under §102, since claim 8 now incorporates (by reference) all of the features recited in its base claim 7.

Accordingly, this rejection should be withdrawn. 

With regard to the Examiner’s §103 rejection of claims 1-7, 9 and 10, Applicant respectfully traverses these rejections as follows.

Applicant’s invention is in the field of telecommunication systems where a controller coupled to a network generates at least one device-signal destined for at least one device for controlling operation of said at least one device. In particular, Applicant’s claimed invention defines a system, a controller, a remote control, and a method for controlling the system, which comprise unique combinations of features. These features include, *inter alia*, a remote control

unit comprising a control-unit-sender for sending a control-signal for remotely controlling at least one device, and a controller-sender incorporated into a controller (which is coupled to a network and controls at least one device) for sending an interface to the remote control unit in response to a trigger-signal. Neither Pope nor Goldstein (applied alone or in any reasonable combination) teaches or suggests such a unique combination of features.

Pope discloses a conventional cordless telephone which also functions as a remote control for controlling various appliances such as TVs, cable, etc. (see id., col. 1, lines 45-60, and Fig. 1; see also Id. col. 3, line 28-34). In particular, Popes discloses cordless telephone 10 which includes memory 66 for storing appliance control codes (see id., col. 4, lines 17-33, and Fig. 2). Telephone 10 sends appropriate control codes stored in memory 66 to base unit 12, which in turn transfers the codes to appropriate appliances thereby controlling appliances' operation (see id., col. 5, lines 14-32, and Fig 5). As acknowledged by the Examiner, Pope "is silent on teaching the controller[base station 12]¹ sending an interface in response to a trigger-signal to the remote control [telephone 10]" (see Office Action, page 5).

Furthermore, and contrary to the Examiner's analysis, Pope does not disclose, teach or suggest that telephone 10 receives any control information (e.g., control codes) from controller 12 for storage in memory 66. Instead, Pope discloses that telephone 10 can receive appliance control codes from remote controls provided with the appliances, "such as a television remote

¹ Here, clearly, the Examiner intended to refer to Pope's base unit "(12)", rather than telephone "(10)" (see Office Action pages 4-10, where the Examiner alleges that "Pope teaches a telecommunication system comprising a controller (12) to be coupled to a network..."). Applicant responds accordingly.

control” and store these codes in memory 66 (see id., col. 4, lines 52-57). In this regard, Pope discloses nothing more than that telephone 10 is capable of functioning as a conventional universal remote control (i.e., a learning remote control) (see id., col. 4, lines 59-61).

Thus, Pope does not disclose, teach or even remotely suggest Applicant’s claimed combination of features which require a controller connected to a network sending an interface to a remote controller, and a remote controller receiving and storing the interface sent by this type of a controller (see Applicant’s independent claims 1, 7, 9 and 10).

The Examiner alleges that Goldstein supplies the Pope’s acknowledged deficiency (i.e., a controller which sends an interface in response to a trigger-signal) by “teach[ing] a remote control requesting (triggering) and receiving an interface from the controller (6) through a bi-directional communication link” (see Office Action, pages 5-10). Applicant respectfully disagrees.

In fact, Goldstein discloses nothing more than a universal remote control 5, which can be programmed to control various devices, and which receives its programming from a cable converter 6 (see id., col. 12, lines 23-33). Goldstein’s cable converter 6 has nothing to do with a controller which is coupled to a network and comprises a controller-generator for generating at least one device-signal destined for at least one device for controlling operation of said at least one device, as recited in Applicant’s independent claims 1, 7, 9 and 10. That is, Goldstein’s cable converter 6 does not generate any device signals for controlling any devices, i.e., it is nothing more than a conventional cable converter connected in a conventional manner to a

source of cable programming, a TV and (optionally) a VCR (see, for example, Goldstein, col. 16, line 17 through col. 18, line 22, and Fig. 14).

Thus, even if, assuming *arguendo*, a skilled artisan would have been motivated to incorporate Goldstein's design for a programmable remote control into Pope's cordless telephone 10, the resulting combination would amount to nothing more than Pope's "cable 16" being replaced with Goldstein's cable converter 6. In this resulting combination, Pope's base unit 12 would not be sending an interface to cordless telephone 10 in response to a trigger-signal. Instead, Pope's cordless telephone 10 would simply be programmed directly by cable 16, rather than by a remote control unit provided with cable 16 (see Pope, col. 4, lines 52-61). Thus, contrary to the Examiner's analysis, Goldstein does not supply the acknowledged deficiency of Pope.

In summary, Applicant's independent claims 1, 7, 9 and 10, as well as the dependent claims 2-6 and 8 (which incorporate all the novel and unobvious features of their base claims) would not have been obvious from any reasonable combination of Pope and Goldstein at least for the reasons set forth above.

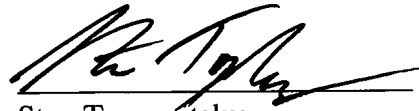
In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.111
Appln. No.:09,619,910

Atty Dkt No. Q59816

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Stan Torgovitsky
Registration No. 43, 958

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE



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PATENT TRADEMARK OFFICE

Date: February 5, 2003

APPENDIX

VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE TITLE:

The title is changed as follows:

TELECOMMUNICATION SYSTEM INCLUDING DEVICE CONTROLLER WITH
DOWNLOADABLE INTERFACE [, AS WELL AS CONTROLLER, AS WELL AS DEVICE,
AS WELL AS] AND REMOTE CONTROL, [AS WELL AS] AND METHOD FOR
CONTROLLING COMMUNICATION SYSTEM

IN THE CLAIMS:

The claims are amended as follows:

1. (Amended) Telecommunication system comprising:
a controller [to be] coupled to a network and comprising a controller-generator for
generating at least one device-signal destined for at least one device for controlling operation of
said at least one device[,];
a first device coupled to said controller and comprising a first device-receiver for
receiving at least one device-signal[,];
a second device coupled to said controller and comprising a second device-receiver for
receiving at least one device-signal[,]; and
a remote control unit comprising a control-unit-sender for sending a control-signal for
remotely controlling at least one device,
[characterised in that] wherein
said controller comprises;

a controller-sender for sending to said remote control unit an interface in response to a trigger-signal [and destined for said remote control unit]; and [comprises]

a controller-receiver for receiving said trigger-signal, and
said remote control unit comprises;

a control-unit-receiver for receiving said interface; and [comprises]

a control-unit-memory for storing said interface.

2. (Amended) [Telecommunication] The telecommunication system according to claim 1, [characterised in that] wherein said control-unit-sender is adapted for sending said trigger-signal.

3. (Amended) [Telecommunication] The telecommunication system according to claim 2, [characterised in that] wherein said trigger-signal comprises an identification-code for identifying a user.

4. (Amended) [Telecommunication] The telecommunication system according to claim 1, [characterised in that] wherein said trigger-signal comprises either at least a first code for indicating said first device or at least a second code for indicating said second device.

5. (Amended) [Telecommunication] The telecommunication system according to claim 1, [characterised in that] wherein:

said controller comprises a controller-detector for detecting an interface-amendment, whereby said controller-sender is adapted for sending a request-signal destined for said remote control unit, and

said control-unit-receiver is adapted for receiving said request-signal, whereby said control-unit-sender is adapted for sending said trigger-signal in response to said receiving of said request-signal.

6. (Amended) [Telecommunication] The telecommunication system according to claim 1, [characterised in that] wherein at least a part of a location in said control-unit-memory at which location said interface has been stored becomes overwritable in response to a further trigger-signal.

7. (Amended) [Controller] A controller to be coupled to a network and for use in a telecommunication system comprising [- said controller comprising a controller-generator for generating at least one device-signal destined for at least one device for controlling operation of said at least one device, [-] a first device coupled to said controller and comprising a first device-receiver for receiving at least one device-signal, [-] a second device coupled to said controller and comprising a second device-receiver for receiving at least one device-signal, [-] and a remote control unit comprising a control-unit-sender for sending a control-signal for remotely controlling at least one device, [characterised in that] said controller [comprises] comprising:
a controller-generator for generating at least one device-signal destined for at least one device;

a controller-sender for sending an interface to said remote control unit in response to a trigger-signal [and destined for said remote control unit]; and [comprises]
a controller-receiver for receiving said trigger-signal.

8. (Amended) [Device coupled to a controller and for use in a telecommunication system comprising

said controller to be coupled to a network and comprising a controller-generator for generating at least one device-signal destined for at least one device,

a first device coupled to said controller and comprising a first device-receiver for receiving at least one device-signal,

a second device coupled to said controller and comprising a second device-receiver for receiving at least one device-signal,

a remote control unit comprising a control-unit-sender for sending a control-signal for remotely controlling at least one device,
characterised in that]

The controller as claimed in claim 7, wherein said trigger-signal comprises either at least a first code for indicating said first device or at least a second code for indicating said second device.

9. (Amended) [Remote] A remote control unit for remotely controlling at least one device and for use in a telecommunication system comprising [-] a controller to be coupled to a network and comprising a controller-generator for generating at least one device-signal destined for at least one device for controlling operation of said at least one device, [a] first device coupled to said controller and comprising a first device-receiver for receiving at least one device-signal, [-] a second device coupled to said controller and comprising a second device-receiver for receiving at least one device-signal, [-] said remote control unit comprising:

a control-unit-sender for sending a control-signal for remotely controlling at least one device [, characterised in that said remote control unit comprises];

a control-unit-receiver for receiving an interface originating from said controller; and
[comprises]

a control-unit-memory for storing said interface.

10. (Amended) [Method] A method for controlling a telecommunication system comprising [-] a controller to be coupled to a network and comprising a controller-generator for generating at least one device-signal destined for at least one device for controlling operation of said at least one device, [-] a first device coupled to said controller and comprising a first device-receiver for receiving at least one device-signal, [-] a second device coupled to said controller and comprising a second device-receiver for receiving at least one device-signal, [-] and a remote control unit comprising a control-unit-sender for sending a control-signal for remotely

controlling at least one device, [characterised in that] said method [comprises the steps of]
comprising:

 sending an interface from said controller to said remote control unit in response to a
trigger-signal [-];

 receiving said interface; and

 storing said interface at said remote control unit.

IN THE ABSTRACT OF DISCLOSURE:

The abstract is changed as follows:

[Known telecommunication] Telecommunication systems, which includes a controller (gateway/server), devices (TV, VCR, refrigerator, security system) and a remote control unit for remotely controlling [said] the devices via [said] the controller, [can be] is made more flexible and more user-friendly by allowing an interface like a user-interface and/or a device-interface to be downloaded into [said] the remote control unit, in response to a trigger-signal comprising a user-identification and/or a device-identification generated due to a user operating [said] the remote control unit or generated due to an interface-amendment reported to [said] the system.